

## **Inspection Report**

**Bihler of America, Inc.**

**85 Industrial Drive**

**Phillipsburg, NJ 08865**

**908-752-9000**

**Inspector:** Edward J. Guster III, Environmental Scientist, USEPA Region 2

**Date of Inspection:** February 20, 2004

**Time of Inspection:**

**EPA ID #:** NJD986653152

**Reason for Inspection:** CEI

**Attendees:** Tom Tilton, Health, Safety and Environmental Compliance Officer

### **Background:**

Bihler of America is a company that produces metal parts for a variety of commercial usage. These parts include, surgical needles, electrical outlets and light switches and metal components on high speed machines. The facility generates mostly D001 waste (Ignitable) and D002 (Corrosive). The facility is a Large Quantity Generator per manifested waste amount and facility representative acknowledgment.

Bihler makes surgical needles for use in the medical field. These needles are manufactured on a high speed machine that takes stainless steel wire and makes it into a needle. The wire is fed into a machine and cut into the length of the needle to be made. The cut wire then continues to a drill machine that places the hole into the needle. Once the needle is complete, it is sent to an electro-polisher. The electro-polisher uses an acid and rinse to clean and polish the needle before it is packed for shipment to Senticon. The electro-polisher produces the D002 waste.

The facility also makes light switches and electrical outlets. This process involves melting plastic pellets and molding them into the shape of a light switch or outlet. The metal frames and wires for the switches and outlets are also made at the facility. Sheet metal and wires are cut into appropriate sizes and placed onto/into the switch or outlet. The waste off of this process includes scrap metals and plastic mold parts. The plastic mold parts are remelted and used to cast new product.

The facility also does its own plant maintenance (painting, washing floors, etc.). This maintenance produces paint waste and solvent waste. These wastes are D001 and F wastes.

Eagle Printing has a manufacturing line that generates paint and printing wastes, these wastes are characteristic D001. Eagle Printing owns the manufacturing line and Bihler runs the line. Bihler stores these wastes in their storage area.

## **Inspection Summary**

Mr. Guster entered the facility and presented his credentials to Mr. Tilton. Mr. Guster stated his intention to conduct a hazardous waste inspection of the facility and Mr. Tilton agreed to the inspection. An opening conference was held in Mr. Tilton's office. Mr. Guster stated that he would like to see some paperwork (manifests, inspections check list, etc.) and that he would like to look at the paperwork after the walkthrough of the Facility. Mr. Tilton got the paperwork and a walkthrough of the facility was conducted.

The first area visited was the needle area. Here, wire entered a machine (there were several machines all performing the same function) and was cut into various sizes. The cut wire was then sent to a drill machine that placed the hole into the wire to make the needle. Once the needle was made, it was sent to the acid electro-polisher. At the time of the inspection, the polisher was not in operation. Mr. Tilton explained that the needles were polished in an acid bath and then rinsed and the process is repeated.

Once the polishing was completed, the needles would get packed and shipped out. The acid is changed when it is no longer effective at polishing the needles. The rinse water is also replaced occasionally. In the area of the electro-polisher was the 55-gallon drum satellite accumulation area. There was one 55-gallon drum that was less than half full in a secondary containment container. The drum was labeled and closed at the time of the inspection. Mr. Tilton stated that when the drum is full, he is told and it is moved immediately to the 90-day storage area.

The next area visited was the light switch and power outlet manufacturing area. Here, the PVC pellets are melted down and pressed into a light switch or outlet. Wires and metal are added to the parts and the outlets/switches are formed. Scrap metal is generated in this area and is sent for recycling.

The next area visited was the 90-day storage area. There was no waste in the area as it was picked up the previous week. The area has secondary containment.

The last area visited was the Eagle Printing area. Here, printing is done on packages and parts with a press or spray gun. The paint and solvent wastes are considered hazardous by the facility. At the time of the inspection, there was no printing being done.

Mr. Guster and Mr. Tilton ended the walkthrough of the facility and went back to Mr. Tilton's office. Mr. Guster conducted a records review and conducted a closing conference. He then left the facility.

## **Records Review**

The following records were reviewed:

1. Manifest- All manifests from 2002 - 2004 were reviewed and LDR forms were with the records.

2. Weekly Inspection Logs- Reviewed by Mr. Guster. One checklist is kept at the 90-day storage area and one is on the computer.
3. Personnel Training Records- Mr. Tilton had his training certificate hanging in his office for 2003 and a list of training candidates was also posted. Everyone received training in 2003. Mr. Guster viewed a sign-in sheet with the names of the people taking the training.
4. Preparedness and Prevention and Contingency Plan- On-site and reviewed by Mr. Guster. Last updated January 9, 2003.
5. Hazardous Waste Biennial Report- On-site and reviewed by Mr. Guster

**Environmental Concerns and Comments**

None were found.

**Recommendations**

No further action is necessary at this time.



Warren Co

~~0000~~/LAC

DATE: 01/12/04  
HWS1760

HAZARDOUS WASTE MANIFEST SYSTEM

SCREEN:

TIME: 14:21:01

GENERATORS / MANIFESTS

TERMINAL: @49M

EPA ID: NJD986653152      COMPANY NAME AND ADDRESS  
BIHLER OF AMERICA INC  
85 INDUSTRIAL DRIVE  
PHILLIPSBURG NJ 08865

LINE NO	DATE SHIP	MANIFEST NO	TSDF	WASTE 1	UNIT 1	QTY 1	MORE
0001	01-04-2001	NJA3059114	NJD002454544	D002	G	100	X
0002	02-01-2001	NJA3069175	NJD002454544	D002	G	150	X
0003	03-02-2001	NJA3069486	NJD002454544	D002	G	100	
0004	03-22-2001	NJA3254930	NJD002454544	D002	G	150	
0005	04-12-2001	NJA3255194	NJD002454544	D002	G	50	
0006	05-10-2001	NJA3295485	NJD002454544	D002	G	150	X
0007	05-24-2001	NJA3295575	NJD002454544	D002	G	110	
0008	06-21-2001	NJA3295792	NJD002454544	D002	G	100	
0009	07-12-2001	NJA3299100	NJD002454544	D001	G	55	X
0010	08-02-2001	NJA3299319	NJD002454544	D002	G	150	X
0011	09-13-2001	NJA3294718	NJD002454544	D002	G	350	
0012	10-11-2001	NJA3256396	NJD002454544	D001	G	55	X
0013	11-15-2001	NJA3295102	NJD002454544	D002	G	250	
0014	12-28-2001	NJA4089045	NJD002454544	D002	G	100	<del>X</del>
0015	01-29-2002	NJA4092704	NJD002454544	D001	G	165	<del>X</del>
0016	02-15-2002	NJA4093056	NJD002454544	D002	G	200	X ✓
0017	03-14-2002	NJA3254792	NJD002454544	D002	G	110	
0018	04-04-2002	NJA3234457	NJD002454544	D001	G	100	X ✓
0019	05-02-2002	NJA4039364	NJD002454544	D002	G	50	
0020	05-24-2002	NJA4045172	NJD002454544	D002	G	50	X
0021	06-28-2002	NJA3234781	NJD002454544	D001	G	100	
0022	07-25-2002	NJA3234997	NJD002454544	D002	G	100	
0023	08-08-2002	NJA4043817	NJD002454544	D002	G	50	X
0024	09-06-2002	NJA4044087	NJD002454544	D001	G	50	X ✓
0025	09-20-2002	NJA4044251	NJD002454544	D002	G	150	X ✓
0026	10-10-2002	NJA4044339	NJD002454544	D002	G	50	X ✓
0027	10-31-2002	NJA4043279	NJD002454544	D002	G	100	X ✓
0028	12-06-2002	NJA4043545	NJD002454544	D002	G	110	X ✓
0029	01-06-2003	NJA4044676	NJD002454544	D001	G	55	X
0030	01-23-2003	NJA4059857	NJD002454544	D002	G	110	
0031	02-13-2003	NJA4060067	NJD002454544	D002	G	150	X ✓
0032	03-06-2003	NJA4060240	NJD002454544	D002	G	55	X ✓

0033	03-28-2003	NJA4059109	NJD002454544	D001	G	50	X	✓
0034	04-24-2003	NJA4059326	NJD002454544	D001	G	50	X	✓
0035	06-09-2003	NJA4058841	NJD002454544	D002	G	150	X	
0036	07-02-2003	NJA4046465	NJD002454544	D001	G	50	X	✓
0037	08-27-2003	NJA5033720	NJD002454544	D001	G	55	X	✓
0038	09-29-2003	NJA5032377	NJD002454544	D001	G	50	X	
0039	10-23-2003	NJA5033993	NJD002454544	D002	G	150	X	✓

12-11-03 NSA 5031455. 100 G Door  
250 G Door



## U.S. Environmental Protection Agency

### Resource Conservation and Recovery Act (RCRAInfo)

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## Query Results



**Consolidated facility information (from multiple EPA systems) was searched to select facilities**

**Handler ID:** Beginning With: NJD986653152

Results are based on data extracted on NOV-09-2003

**Note:** Click on the underlined CORPORATE LINK value for links to that company's environmental web pages. Click on the underlined MAPPING INFO value to obtain mapping information for the facility.

[Go To Bottom Of The Page](#)

<u>HANDLER NAME:</u>	BIHLER OF AMERICA INCORPORATED	<u>HANDLER ID:</u>	NJD986653152
<u>STREET:</u>	85 INDUSTRIAL DR.	<u>FACILITY INFORMATION:</u>	<a href="#">View Facility Information</a>
<u>CITY:</u>	PHILLIPSBURG	<u>CORPORATE LINK:</u>	No
<u>STATE:</u>	NJ	<u>COUNTY:</u>	WARREN
<u>ZIP CODE:</u>	08865	<u>MAPPING INFO:</u>	<a href="#">MAP</a>
<u>EPA REGION:</u>	2		

#### CONTACT INFORMATION

<u>NAME</u>	<u>STREET</u>	<u>CITY</u>	<u>STATE</u>	<u>ZIP CODE</u>	<u>PHONE</u>	<u>TYPE OF CONTACT</u>
THOMAS L TILTON					9082139001	Public

#### LIST OF NAICS CODES AND DESCRIPTIONS

<u>NAICS CODE</u>	<u>NAICS DESCRIPTION</u>
332991	Ball and Roller Bearing Manufacturing
333513	Machine Tool (Metal Forming Types) Manufacturing

[Go To Top Of The Page](#)

**Total Number of Facilities Displayed: 1**

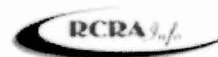
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Last updated on Friday, January 30th, 2004 [http://oaspub.epa.gov/enviro/fii\\_master.fii\\_retrieve](http://oaspub.epa.gov/enviro/fii_master.fii_retrieve)



## CM&E Evaluations List


**BIHLER OF AMERICA INC**
**PHILLIPSBURG**
**NJD986653152**

Select the Evaluation to process or choose the Add New Evaluation button below:

Your search has found **4** Evaluations.

Evaluations							Violations						
Act Loc	Seq #	Type	Date	Agency	Resp Person	Reason	Determined Date	Seq #	Type	Resp Agency	Class - Priority	Latest Sched RTC	Actual RTC
NJ	000	<u>OTH</u>	10/16/1998	S	NJRA		No violations linked to this evaluation at this time.						
NJ	000	<u>CSE</u>	5/8/1996	S	NJRJ		4/25/1996	0001	GER	S	1 -	5/3/1996	5/8/1996
NJ	000	<u>CEI</u>	4/25/1996	S	NJRJ		4/25/1996	0001	GER	S	1 -	5/3/1996	5/8/1996
NJ	000	<u>CEI</u>	4/26/1994	S	NJBF		No violations linked to this evaluation at this time.						

**Add New Evaluation**

Go To

URL: CME/CME\_eval\_main.asp



# Hazardous Waste and Non-Hazardous Waste Container Labeling Chart

Profile #	Label Description	Waste Description (Contents of the container)
	<b>LABELED NON-HAZARDOUS WASTE</b>	
3	Oils/coolant/water	Oil/coolants contaminated with water from compressors
13	Used Antifreeze	Antifreeze
<del>15</del>	<del>Used Abzol</del>	<del>Abzol</del>
17	Used Oil	Used oils from machines
<del>21</del>	<del>Soda ash, Abzol</del>	
24	Voltz Red	Parts Cleaner solvent ONLY
25	Absorbents/rags/Speedi-dri & oil	Machine and floor clean up
29	Antifreeze and absorbents	Antifreeze leak clean up
33	Used Drying Media - Dessicant	Dessicant from air dryers
34	Used HFE-71DA	Spent HFE
36	Petroleum contaminated earth	Oil leak/spill residue
37	Used HFE-72DA	Spent HFE
	<b>LABELED HAZARDOUS WASTE</b>	
8	Used oil filters	Filters saturated with cutting, lubricating or other oil
10	Absorbents, paints and thinners	Absorbents/rags saturated with paints and solvents
12	Paints and thinners	Bulk paints, thinners and solvents
19	Used Floor cleaner	Floor Cleaner (mild-corrosive)
22	Spend aerosol spray cans – paints/ lubricants/solvents	Any spray cans with residual gas propellant
23	PA-4 Acid	Electropolish acid
27	Mixed Acids	Phosphoric &/or PA 4 acid mixture
28	Machining Grinding Coolants with grinding dust & metal fines	Grinding coolant contaminated with metal filings/particles, etc
30	Acid rinse water	EP rinse water-no metals-pH >2.2, < 7.0
32	Absorbents and acid	Absorbents from acid area clean up
33	Used Drying Media - dessicant	Dessicant from compressor air dryers
35	Solvents, paints, & inks	Eagle printing and maintenance waste
	<b>NON-LABELED WASTE</b>	
	None – Non-recyclable waste/garbage	HVAC Air Filters, Wood & maintenance debris. Cafeteria, restroom, office and production waste and debris.
	None – recyclable waste	Cardboard – recycled
	None – recyclable waste	Metals – recycled



## INSPECTOR'S MULTI-MEDIA CHECKLIST

Revised: August 2003

Facility Name:

Biller of America

Address:

\_\_\_\_\_  
\_\_\_\_\_

ID No.:

\_\_\_\_\_

Contact:

Tom Tilton

Phone:

\_\_\_\_\_

Inspector:

ED Guster

Phone:

\_\_\_\_\_

Div./Br.: \_\_\_\_\_

Date of Inspection:

\_\_\_\_\_

Referred by LAN to :

\_\_\_\_\_

Date of Referral:

\_\_\_\_\_

Referrals must be made only to Program Contacts on page 2.

[copy to C. Zafonte, MM Enforcement Coordinator, for tracking.]

Referee is requested to provide an initial response within 3 weeks of the referral.

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### GENERAL GUIDANCE

#### VISUAL CUES OF POSSIBLE NON-COMPLIANCE WARRANTING INQUIRY

- Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.
- Stains or discoloration of soil, concrete, or floors in work areas.
- Distressed vegetation - unhealthy, discolored, or dead.
- Dark smoke or dust clouds, or smoke coming from other than a smoke stack.
- Unusual odors or strong chemical smells.
- Sheen on surface waters.

#### CHECK IT OUT!

- o ... if you see or hear something suspicious during an inspection. Ask probing questions:
  - What is it? Is it a waste product?
  - What process produced it?
  - Has it been tested?
  - Where do you normally dispose of it?
  - Do you have a permit for the disposal?
  - How long has the circumstance existed?
  - When did it begin?
- o Pay attention to the situation, and take photographs.
  - Note the location and the amount of pollutant that appears to be involved.
  - Take notes describing the situation, the source of the pollutant and its emission point.

## TABLE OF CONTENTS & PROGRAM CONTACTS

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General Guidance.....		1
AIR (incl. CFCs & Asbestos):	<i>Lead/cc: Backup</i> Harish Patel/ 212-637-4046 Ken Eng -4080	3
CEPD/ESB: EMB:	Carlos O'Neill 787-729-6951(x230) Victor Trinidad 226	----
EPCRA Toxic Release Inventory: cc: PTSB-TS Section Chief	Nora Lopez/ 732-906-6890 Dan Kraft 732-321-6669	4
- All other EPCRA:	John Higgins -6194	4
Federal Facilities:	Kathleen Malone/ -4083 John Gorman 212-637-4008	-----
FIFRA: cc: PTSB Branch Chief	Adrian Enache 732-321-6769 Ken Stoller 732-321-6765	5
NPDES and Pretreatment (industrial WW discharge to a sanitary system):		
NJ & NY Pretreatment:	Philip Greco 212-637-3313	6
NJ & NY Surface & Storm Water Discharges	Ari Harris -3763	
Caribbean NPDES and Pretreatment:	Carlos O'Neill 787-977-5821	
Oceans:	Doug Pabst -3797	-----
Public Water Supply:	Doug McKenna -4244	7
Radiation:	Jeanette Eng -4007	7
RCRA:	Phil Flax -4143	8
Remedial Actions in NJ:	Carole Petersen -4418	-----
NY & Caribbean:	John Lapadula -4262	
Removal Actions:	Richard Salkie 732-321-6658 Bruce Sprague -6656	-----
SPCC/FRP:	Doug Kodama 732-906-6905	9
TSCA: PCBs	Dan Kraft 732-321-6669	10
Chemicals	Mike Bious 732-906-6892	
cc: PTSB-TS Section Chief	Dan Kraft 732-321-6669	
UIC:	Chip Hillenbrand 212-637-4226	6
UST:	"	11
Wetlands:	David Pohle/ 212-637-3824 Daniel Montella -3801	11
<u>Criminal Investigations Division -</u>	William V. Lometti -3634	11

## REPORTING POSSIBLE NON-COMPLIANCE

Throughout this checklist, there are YES/NO questions to be circled. If a bold YES or NO field is circled, there is a follow-up question. If you circle a field marked with an asterisk (\*), you should promptly refer the matter to the Region II office for that program. After you return from your inspection, immediately let your supervisor know that you observed possible non-compliance in another program area during your inspection. The information should then be referred to the appropriate contact listed above.

### Air

With the sun in a 140° arc BEHIND you, is opaque smoke being emitted?  
**Note:** "Opaque smoke" is not steam -- will obscure anything behind it for >5 minutes.  
 Steam dissipates at a given point; smoke trails off.  
**Note relative positions of the sun, the observer and the emission point.**

YES\*

NO

**If YES:**

Note color of smoke: \_\_\_\_\_.

From which specific process line is smoke coming? (e.g., "Boiler No. 4" or "Coating Line C"). \_\_\_\_\_.

What is the cause of the smoke emission? e.g., -

i. Is air pollution control equipment out of service, or turned off during production?  
**If YES:** When will it be back on line? \_\_\_\_\_

YES NO

ii. Is the facility under an unusual load, using different fuels, or process feeds?

YES NO

Have any processes been added or changed in any way in the last 2 years?

YES NO

**If YES:** Did the facility obtain state or federal air pollution permits for it?

YES NO\*

Has the facility undergone any renovation or demolition during the last 18 months, involving removal or disturbance of asbestos-containing materials?

YES NO

Approximate square or linear feet of materials involved? \_\_\_\_\_.

If >260 linear feet, or 160 square feet, and the facility has submitted a notification, ask for a copy and send it to ACB (this is not a referral).

If >260 linear feet, or 160 square feet, and the facility has not submitted a notification, **REFER** to the Air Compliance Branch for followup.

Do facility employees maintain, service, repair, or dispose of air conditioning/refrigeration equipment involving CFC refrigerant?  
 [If a contractor does this work, do not refer the matter.]

YES NO

**If YES:** Does facility have Recovery/Recycle or Recovery only equipment?

YES NO\*

## Emergency Planning and Community Right-to-know Act (EPCRA)

### Toxic Release Inventory (TRI)

1. Does the facility have 10 or more full-time employees? YES NO

b. Is the facility classified under any of the following sectors?

YES	NO	Type of facility	YES	NO	Type of facility
<u>+</u>	—	manufacturing	—	—	electric utilities
—	—	commercial hazardous waste treatment	—	—	petroleum bulk terminals
—	—	metal mining,	—	—	chemical wholesaler
—	—	coal mining	—	—	solvent recovery services.

See manifest  
manifest sheet

If the answers to **both** questions 1. and 2. are **YES**, ask :

A. Is the facility aware of EPCRA Section 313 or Toxic Release Inventory Requirements?

YES NO\*

B. Is the facility aware of recent reporting thresholds reduction of listed chemicals manufactured, processed or used ?

YES NO\*

If the answer for either A or B is No, provide EPA program contacts for compliance assistance.

**Region II EPCRA - Toxic Release Inventory: 732-906-6890.**

### All Other EPCRA:

a. Is there on-site any of the 360 "Extremely Hazardous Substances" in excess of established threshold planning quantities (which vary by chemical, and range from 1 to 5000 lb.)?  
**If YES:** Were the State Emergency Response Commission (SERC) and Local Emergency Planning Committee (LEPC) notified of these chemicals for local planning purposes?

YES NO

YES NO\*

a. Has the facility had a release of an Extremely Hazardous Substance or a CERCLA hazardous substance in excess of the Superfund reportable quantity (assume 1 lb.)?

YES\* NO

**If YES:** Was notification of the release provided?

YES NO\*

**If YES:** i. To whom was the notification given? \_\_\_\_\_

ii. Was notification oral or written? \_\_\_\_\_

iii. If oral, was a written, follow-up report submitted? \_\_\_\_\_

YES NO\*

[If the facility does not know the answers to any of i, ii, or iii questions, **\*REFER\***.]

b. Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard?

YES NO\*

c. If the facility has >10,000 lb of any hazardous chemicals, or Extremely Hazardous Substances >threshold planning quantities, have MSDS (or a list of MSDS), and chemical inventory forms been given to state and local emergency planning authorities and the local fire department?

YES NO\*

P/A

## Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

### 1. If inspecting a manufacturing facility, ask:

- A. Are any pesticides manufactured, relabeled, or repackaged at this establishment?  
Pesticide is any substance or mixture intended (1) to prevent, destroy, repel, or mitigate any pest, or (2) for use as a plant regulator, defoliant, or desiccant. YES NO
- B. If A. is YES, does the establishment have an EPA Establishment Number?  
(All production, relabeling and/or repackaging must be registered with EPA.) YES NO\*
- C. If B. is Yes, enter the Establishment Number: \_\_\_\_\_ and continue:
- D. Has the company filed the Annual Pesticide Production Report form?  
(due March 2 of each year for the previous calendar year's production.) YES NO\*

### 2. If inspecting a storage-distribution facility or a retail facility, ask: - N/A

- A. Are any pesticides being held for sale/distribution, or stored at this facility (warehouse)? YES NO
- B. If A. is YES, are restricted-use pesticides stored, or held for distribution/sale at this facility? YES\* NO
- C. Are any containers leaking? YES\* NO
- D. Are pesticides stored next to acid, caustic and/or oxidizing materials? YES\* NO

### 3. If pesticides may not have been properly used, observe and record any effects such as human adverse reaction(s), dead fish, birds, or wildlife, plant damage, etc, and ask:

- A. Have pesticides been applied by an employee or by a pesticide application company? outs. or contractors YES  
S\*

#### B. If A. is YES, ask for:

- Date of application,
- Name of pesticide applied,
- Name of pesticide applicator company, or facility person who made the application,
- Address and/or phone number of pesticide applicator company (if applicable),
- Type of health complaints from employee (if applicable),
- Contact person for follow-up.

### 4. If inspecting a public housing, educational, or day care facility, farm market, flea market, spa or health facility, beauty parlor, or private housing, are pesticides sold there?

YES\* NO

- A. If 4. is YES, are the pesticides registered for agricultural use (see label)  
If you suspect, or are unsure if the pesticides are registered for agricultural use, \*Refer\*. YES\* NO

#### B. If A. is YES, ask for:

- Name and identity (e.g farmers, homeowners, pesticide applicators, etc.) of the buyers,
- Address and telephone number of the buyers,
- Name(s) of pesticide purchased,
- EPA Registration Number (EPA Reg. No.) of pesticide(s) purchased. N/A

- C. Are pesticides sold in unlabeled containers or with hand-written labels.

YES\* NO

Note: If you suspect, but are unsure, that pesticides are being sold in unlabeled containers, or with hand-written labels, \*REFER\* this.

**NPDES, Pretreatment & UIC**

1. Does the facility generate industrial wastewater (IW), sanitary wastewater (WW) and/or storm water (SW) and dispose of any of it as follows (Circle as applicable):
- a. To a receiving stream/surface water body (or onto ground near enough to impact one)? *to pond then to PHMSB* IW ~~WW~~ SW
- b. To a sanitary sewer system that discharges to a municipal treatment plant (POTW)?..... IW WW SW
- c. To a storm water sewer system?..... IW\* WW\* SW
- d. To a subsurface disposal system (septic system, drywell, cesspool, sinkhole)? *no* IW\* WW SW
- e. Is any of it trucked off site? *no* IW WW SW
- f. Onto ground surface (e.g. spray, discharge pipe, open trench) *no* IW WW SW

Identify the water bodies and/or sewer system: \_\_\_\_\_

- 2a. Are there floor drains, sinks (not in bathrooms), or storm water collection structures:  
 - where raw materials, products, wastes or wastewaters are generated, stored or transported &/or  
 - that are possibly receiving wastes due to poor housekeeping, etc.? YES NO
- b. If YES to a, is there fluid in the drain/structure? YES NO
- c. If YES to a, is there evidence that contaminants entered drain/structure?  
 (e.g., discolored or smelly fluid; stained drain or floor nearby) YES\* NO
- d. Ask what types of fluids enter drains/structures: \_\_\_\_\_
- 3a. Has the facility applied for a permit for each discharge noted in question 1? YES  
 S  
 NO  
 \*
- If permitted, ask for permit numbers *they get visited every yr. by POTW*
- b. If you answered yes to question 1a or 1c for storm water, but the facility does not have a storm water discharge permit, ask why (facility may not be subject to stormwater requirements):
- c. If you answered question 3b, ask what SIC code(s) describe all the facility's activities<sup>1</sup>: \_\_\_\_\_
- 4 a. Does the facility treat wastewater before discharge? YES NO
- b. How is it treated? \_\_\_\_\_

\* Refer this to water program (to WCB, if the site is in NY or NJ; to CEPD's ESB, if in PR or VI).

<sup>1</sup> If the first 2 digits of any facility SIC code are 10-14, 20-45 or 51, or if facility is a landfill/land application site, recycler, hazardous waste TSD, or steam electric power generator, or if there are construction activities covering >5 acres, refer this to the water program (WCB, if the site is in NY or NJ; CEPD's ESB, if in PR or VI).

**Public Water Supply**

1. **Observe/Ask:** Does the facility have its own potable water supply?
2. **If YES,** does the facility provide potable water for 25 or more persons?
3. **If YES,** is the water analyzed for contaminants & results reported to the state?

YES ☒ NO

YES NO

YES NO\*\*

**\*\* Refer this to water program (to WCB, if the site is in NY or NJ;  
to CEPD's EMB, if in PR or VI).**

**Radiation**

1. Are radioactive materials used or stored at this facility?
2. **If YES,** does the facility have a state or federal radiation license for them?

YES ☒ NO

YES NO\*

### Resource Conservation & Recovery Act (RCRA)

If the facility has a RCRA permit or "interim status" as a treatment, storage or disposal facility (TSDF), **DO NOT** answer the rest of the RCRA questions, but enter the facility's EPA ID #:

---

**If the facility does not have this ID number, ask:**

- 1.A. Has the facility determined that it generates hazardous waste? YES NO  
 If **YES**, ask how the determination was made: \_\_\_\_\_  
 If **NO**, skip Questions 2 to 8 and go to Question 9. If **YES**, continue:
  - B. If the facility generates or transports hazardous waste, ask for its EPA ID No.? \_\_\_\_\_  
 If the facility cannot produce an ID Number, **\*REFER\***.]
- 2.A. Are there containers or tanks that hold hazardous waste? YES NO  
 If **NO**, go to Question # 3. If **YES**, continue:
  - B. Are the containers and/or tanks clearly marked with the words "Hazardous Waste," and are they marked with the accumulation start date? YES NO\*
  - C. Do hazardous waste storage tanks have secondary containment (berm, vault, double walls)? YES NO\*
  - D. Does the facility store hazardous waste in containers or tanks for >90 days? YES\* NO
3. Does the facility store, treat or dispose of hazardous waste in lagoons, pits, piles or landfills? YES\* NO
4. Does the facility treat hazardous waste by incineration, precipitation, neutralization, or other means to change the physical or chemical nature of the waste? YES\* NO
5. Does the facility accept hazardous waste for treatment, storage or disposal from off-site locations (including off-site facilities owned by the same company)? YES\* NO
6. Does the facility maintain copies of hazardous waste manifests on-site? YES NO\*
7. Do hazardous waste storage or treatment units (e.g., containers or tanks) appear to be poorly maintained and may release hazardous waste to the environment? YES\* NO
8. Do chemicals or wastes appear to have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges? YES\* NO
- 9.A. Does facility generate non-hazardous process wastes, excl. office paper, cafeteria wastes, etc? YES\* NO  
 If **NO**, go to Question 10. If **YES**, continue:
  - B. What type of non-hazardous wastes does the facility handle? (e.g., treatment sludges, ash, solvents, waste oils) \_\_\_\_\_
  - C. Very briefly describe the process(es) that generate the wastes in Question 9B.  
 \_\_\_\_\_

Do waste generation, handling, management or disposal appear to, or threaten to, cause environmental damage? YES\* NO

### Spill Prevention, Control & Countermeasure (SPCC)

1. A. Does the facility store oil, whether petroleum, vegetable or transformer oil?

YES ☒ NO

1. B. If YES, does the storage capacity exceed:

1320 gallons in all aboveground storage tanks?

YES\* NO

42,000 gallons in underground storage tanks (USTs)?

YES\* NO

(Excluding USTs that come under EPA's UST regulation at 40 CFR §280, or a State-delegated UST regulation 40 CFR §281 - - ASK THE FACILITY REPRESENTATIVE: SINCE THE TANKS MUST BE REGISTERED, THE FACILITY REP SHOULD KNOW.)

List aboveground oil storage capacity:

List underground oil storage capacity:

2. If the answer to either part of #1. B. was YES, did the facility show you a copy, or have available a Spill Prevention, Control, and Countermeasure (SPCC) Plan? YES NO\*

3. Did the facility have an oil spill within the last 12 months that reached surface waters?

YES\* NO

**Note:**

If any one of the items denoted above for referral with an asterisk (\*) are present, and the total above ground oil storage capacity of the facility is 20,000 gallons or greater, refer the facility for followup action by the SPCC program

If any one of the items denoted above for referral with an asterisks (\*) are present and the total above ground oil storage capacity of the facility is less than 20,000 gallons, please refer the facility to the SPCC program for informational purposes. These facilities are generally a low priority for the SPCC program, and are seldom inspected.

If completion of the above questions will result in a referral for followup action, if possible take pictures of the tanks, provide a brief description of the distance from the tanks to the nearest surface water, and forward this information along with the referral.

**Facility Response Plan (FRP)**

1. Does the facility have an above-ground oil storage capacity 42,000 gallons and conduct operations that include over-water transfers of oil to or from vessels? YES\* ☒ NO

2. Does the facility have oil storage capacity one million gallons?

YES\* NO

3. Did the facility submit a Facility Response Plan to the EPA?

YES NO

N/A

## Toxic Substances Control Act (TSCA)

### Polychlorinated Biphenyls (PCBs)

**SAFETY WARNING:** Stay ten feet from any high voltage conductors.

1. Is there liquid-filled electrical equipment (transformers, capacitors) manufactured before 1980?  
(Exclude equipment with <3 lb (1 quart) of fluid. Only include utility-owned equipment when inspecting a utility.) YES ☒ NO ☐
    - A. If Yes, how many of the above are transformers containing: PCBs >500 ppm? \_\_\_\_\_ \*
      - <500 ppm but 50 ppm? \_\_\_\_\_ \*
      - fluid of unknown PCB concentration? \_\_\_\_\_ \*
    - B. If Yes, how many of the above are capacitors? \_\_\_\_\_ \*
  2. Are there hydraulic systems manufactured before 1980 that use/used high temperature fluid? YES ☒ NO ☐
    - A. If Yes, has each system been tested for PCBs? YES NO\*
    - B. Do any currently have PCB concentrations 50 ppm? YES\* NO
  3. Does the facility have any oil-filled heat transfer systems manufactured before 1980? YES NO
    - A. If Yes, has each system been tested for PCBs? YES NO\*
    - B. Do any currently have PCB concentrations >50 ppm? YES\* NO
  4. Does the facility have PCB waste stored for disposal? YES\* NO
- OBSERVE PCB Items** (transformers, capacitors, containers)  
Are any **leaking**? YES\* NO
- Do all (except transformers <500 ppm) have a **PCB Mark M<sub>L</sub>**? YES NO\*
- OBSERVE PCB Waste:** In addition to the PCB Mark M<sub>L</sub>, is PCB waste in storage for disposal marked with the **date removed from service for disposal**? YES NO\*
- Is **PCB waste currently stored** for more than 30 days in any area? YES NO
- If **YES**, is the storage area included in a RCRA permit for storing hazardous waste in containers? YES NO
- If **NO**, does the area have a roof and walls to keep out rain? YES NO\*
- a 6"-high impervious containment berm? YES NO\*
- a PCB Mark M<sub>L</sub> for the area? YES NO\*
- a location not in a 100-year flood plain? YES NO\*

**General Chemical Regulations:** Does the facility manufacture, or import into the United States, any chemicals for which they are the sole manufacturer/importer?

YES ☒ NO

If YES, do they know that these chemicals are on the TSCA chemical inventory?

YES ☐ NO\*

### Underground Storage Tanks (USTs)

Does any UST have >10% volume underground and contain petroleum products or CERCLA hazardous substances?

YES ☒ NO

Do all USTs store fuel oil for on-site heating?

YES ☐ NO

If YES, the facility is exempt. Do not complete the rest of the UST questions.

Name the petroleum product or hazardous substance in each UST.

Is there evidence of UST leakage/spillage?

YES\* ☐ NO

\* Refer facility to the Water Compliance Branch.

### Wetlands

1. A. Are wet areas (marshes, swamps, bogs) on or adjacent to the site?  
(A federal wetland need not have standing water or wetland-type vegetation; some wetlands have shrubs and trees.)

YES ☐ NO ☒

B. Are there any waterbodies or waterways on or adjacent to the site?

YES ☐ NO ☒

2. If # 1. A OR B is YES, is any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the areas, or is there any evidence that such activities occurred very recently?

YES ☐ NO ☐

3. If YES, when was the work undertaken? \_\_\_\_\_  
Does the facility have any permits for this work?

YES ☐ NO\* ☐

4. If YES, what agency(s) issued the permits? \_\_\_\_\_  
e.g., U.S. Army Corps of Engineers; State environmental agency.  
For federal permits, what type of permits are they (i.e., nationwide, regional, individual)?  
\_\_\_\_\_

If facility is unable to provide adequate response to # 4, \*REFER\*.

### **CRIMINAL ACTS**

During the course of this inspection, has anything been brought to your attention indicating:

1. That the facility is involved in deliberate acts of dumping or discharging wastes

YES\* ☐ NO ☒

2. Bad intent or conduct? e.g., falsification of records or efforts to conceal activities?

YES\* ☐ NO ☒

3. Actual harm to individuals as a result of violations?

YES\* ☐ NO ☒

4. Other activity or behavior that you believe indicates criminal behavior?

YES ☐  
S\* ☒  
NO ☐

\* Refer to Criminal Investigation Division, if you checked YES.



Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

# Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received  
(For Official Use Only)

090793BU

SECTION

## I. Installation's EPA ID Number (Mark 'X' in the appropriate box)



A. First Notification



B. Subsequent Notification  
(complete item C)

C. Installation's EPA ID Number

MJD986653152

## II. Name of Installation (Include company and specific site name)

BIHLER-OF-AMERICA-INC

## III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

85-INDUSTRIAL-ROAD

Street (continued)

City or Town

PHILLIPSBURG

State

ZIP Code

NJ

08865-

County Code

County Name

041 WARREN

## IV. Installation Mailing Address (See Instructions)

Street or P.O. Box

85-INDUSTRIAL-ROAD

City or Town

PHILLIPSBURG

State

ZIP Code

NJ

08865-

## V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

POALILLO

DIAN

Job Title

Phone Number (area code and number)

HEALTH & SAFETY OFFICER

908-725-9000

## VI. Installation Contact Address (See Instructions)

A. Contact Address  
Location Mailing

B. Street or P.O. Box



55-READINGTON-ROAD

City or Town

State

ZIP Code

NORTH-BRANCH

NJ

08876-

## VII. Ownership (See Instructions)

A. Name of Installation's Legal Owner

MR-OTTO-BIHLER

Street, P.O. Box, or Route Number

PO BOX 25 D-87641 HALBLECH

City or Town

State

ZIP Code

GERMANY

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner  
Indicator

(Date Changed)

Month Day Year

Yes

No

1D - For Official Use Only

## VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to Instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities
<p>1. Generator (See Instructions)</p> <p><input type="checkbox"/> a. Greater than 1000kg/mo (2,200 lbs.)</p> <p><input checked="" type="checkbox"/> b. 100 to 1000 kg/mo (220 - 2,200 lbs.)</p> <p><input type="checkbox"/> c. Less than 100 kg/mo (220 lbs.)</p> <p>2. Transporter (Indicate Mode in boxes 1-5 below)</p> <p><input type="checkbox"/> a. For own waste only</p> <p><input type="checkbox"/> b. For commercial purposes</p> <p>Mode of Transportation</p> <p><input type="checkbox"/> 1. Air</p> <p><input type="checkbox"/> 2. Rail</p> <p><input type="checkbox"/> 3. Highway</p> <p><input type="checkbox"/> 4. Water</p> <p><input type="checkbox"/> 5. Other - specify</p>	<p><input type="checkbox"/> 3. Treater, Storer, Disposer (at installation) Note: A permit is required for this activity; see instructions</p> <p>4. Hazardous Waste Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketers</p> <p><input type="checkbox"/> c. Boiler and/or Industrial Furnace</p> <p><input type="checkbox"/> 1. Smelter Refractor</p> <p><input type="checkbox"/> 2. Small Quantity Exemption</p> <p>Indicate Type of Combustion Device(s)</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 5. Underground Injection Control</p>	<p>1. Off-Specification Used Oil Fuel</p> <p><input type="checkbox"/> a. Generator Marketing to Burner</p> <p><input type="checkbox"/> b. Other Marketer</p> <p><input type="checkbox"/> c. Burner - Indicate device(s) - Type of Combustion Device</p> <p><input type="checkbox"/> 1. Utility Boiler</p> <p><input type="checkbox"/> 2. Industrial Boiler</p> <p><input type="checkbox"/> 3. Industrial Furnace</p> <p><input type="checkbox"/> 2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification</p>

## IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001)	2. Corrosive (D002)	3. Reactive (D003)	4. Toxicity Characteristic (D000)	(Use specific EPA hazardous waste number(s) for the Toxicity characteristic contaminant(s))
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 F001	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring a handler to have an I.D. number. See instructions.)

1	2	3	4	5	6
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## X. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature <i>Dian C. Ball</i>	Name and Official Title (type or print) HEALTH & SAFETY OFFICER	Date Signed September 1, 1993
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## XI. Comments

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)



## Bihler of America, Inc.

DISTRIBUTORS **BIHLER** VARI-SLIDE  
PUNCHING AND FORMING PRESSES

July 14, 1994

55 Readington Road  
North Branch  
New Jersey 08876

Telephone: 908-725-9000  
Telefax: 908-725-0457

US EPA Region II  
Air & Waste Management Division  
Attn: RCRA Notifications  
26 Federal Plaza, Room 1006  
New York, N.Y. 10278

*Copy DEP*

To Whom It May Concern:

*File Only*

Re: EPA ID# NJD 986653152

The application for the above-referenced EPA ID# stated that the location was at 85 Industrial Road. However, the correct address is 85 Industrial Drive.

Please change your records to reflect this correction.

Should you require any further information, please contact me at the above location.

Very truly yours,

BIHLER OF AMERICA, INC.

*Dian C. Cucchisi*  
Dian C. Cucchisi  
Health & Safety Officer

